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Attorneys for Plaintiff J.H., a Minor,
through his Guardian ad Litem, Joan Tillman

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

J.H., a minor, through his Guardian ad
Litem, JOAN TILLMAN,

Plaintiff,

v.

COUNTY OF SAN MATEO; AYSE
DOGAN; JULIE BERKOVATZ;
TAMIKA DAWSON; and DOES 1 to 50,
inclusive,

Defendants.

CASE NO. 20-CV-00961-VC

**STIPULATION TO CONTINUE CASE
MANAGEMENT CONFERENCE AND
EXTEND THE DEADLINE FOR
DEFENDANTS TO FILE THEIR
RESPONSE TO PLAINTIFF'S SECOND
AMENDED COMPLAINT**

Action Filed: February 7, 2020

Trial Date: TBD

Plaintiff J.H. ("Plaintiff") and Defendants COUNTY OF SAN MATEO, AYSE DOGAN,
and JULIE BERKOVATZ ("Defendants") hereby stipulate, by and through their counsel, to
extend the deadline by two weeks for Defendants to file their responsive pleading to Plaintiff's
Second Amended Complaint which, following the court's ruling on Defendants' motion to

dismiss Plaintiff's First Amended Complaint (ECF-33), is required to be filed by December 7, 2020. As such, Defendants' responsive pleading to Plaintiff's Second Amended Complaint is due no later than January 11, 2021.

Plaintiff and Defendants further hereby stipulate to continue the initial Case Management Conference currently set for October 20, 2020 at 10:00 a.m. to a date following Defendants' filing of their responsive pleading or after January 11, 2021 given that the case is not at issue and it is unclear at this time how or to what extent Plaintiff may amend its complaint. Plaintiff and Defendants have made repeated attempts to contact defendant Dawson's counsel via email and telephone but as of this date, Dawson's counsel has not responded. Additionally, the court's reference during the October 8, 2020 hearing to the possibility of staying the civil case while the underlying criminal case against defendant Dawson is pending further supports a continuance of the initial Case Management Conference.

IT IS SO STIPULATED.

Dated: October 13, 2020

ALTAIR LAW
and
LAW OFFICE OF JOSEPH S. MAY

/s/ Joseph S. May

By: JOSEPH S. MAY
Attorneys for Plaintiff J.H.

Dated: October 13, 2020

JOHN C. BEIERS, COUNTY COUNSEL

/s/ Joseph F. Charles

By: JOSEPH F. CHARLES and
KIMBERLY A. MARLOW
Attorneys for Defendants County of San
Mateo, Dogan, and Berkovatz

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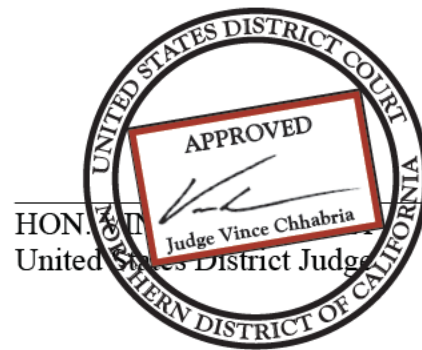
~~[PROPOSED]~~ ORDER

Pursuant to the foregoing stipulation, and for good cause shown, the Court hereby continues the deadline for the filing of Defendants' responsive pleading to Plaintiff's Second Amended Complaint to no later than January 11, 2021.

The Court also continues the Initial Case Management Conference from October 20, 2020 to March 3, 2021.

IT IS SO ORDERED.

DATED: October 14, 2020



HON. VINCE CHHABRIA
United States District Judge